
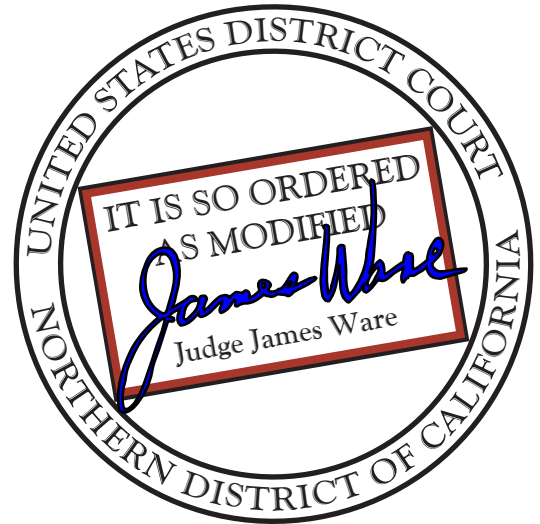


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Attorney for Defendant
Sharon Wang



**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHARON WANG,

Defendant.

No. CR 11-686 JW

**STIPULATION TO CONTINUE FILING
DEADLINES AND HEARING ON
MOTION TO DISMISS AND TO
EXCLUDE TIME; ~~PROPOSED~~ ORDER**

Before The Honorable James Ware

The parties stipulate to continue the filings deadlines and hearing on defendant Sharon Wang's to-be-filed motion to dismiss. Currently, Ms. Wang's motion is due to be filed on Monday, February 13, 2012, the government's opposition brief is due on February 27, 2012, and Ms. Wang's reply is due on March 5, 2012. The motion hearing is scheduled for March 12, 2012, at 1 :30 p.m. The parties request the following deadlines and hearing date instead:

Motion to dismiss filing deadline : March 19, 2012

Opposition brief filing deadline : April 2, 2012

Reply brief filing deadline : April 9, 2012

Hearing on motion to dismiss : April 23, 2012 at 1:30 p.m.

**STIPULATION TO CONTINUE TRIAL SETTING HEARING AND TO EXCLUDE TIME; ORDER
~~PROPOSED~~; CASE NO. CR 11-686 (JW)**

1 This request is made in order to permit Magistrate Judge Vadas sufficient time to complete
2 his Report and Recommendation regarding this motion. The parties appeared via video before
3 Magistrate Judge Vadas on February 8, 2012. During the video conference, Magistrate Judge
4 Vadas requested that a walled-off Assistant U.S. Attorney be permitted to see certain of the sealed
5 documents so that he could respond to them on behalf of the government, in order to assist
6 Magistrate Judge Vadas with making his Report and Recommendation regarding the procedures to
7 use for the motion to dismiss. Counsel for Ms. Wang has provided these documents to the
8 Assistant U.S. Attorney, and he now has two weeks to respond on behalf of the government. After
9 he responds, the parties are to schedule another hearing date in front of Magistrate Judge Vadas.
10

11 Therefor, it will not be possible for Ms. Wang to file her motion to dismiss as scheduled,
12 and the parties request that the deadlines and hearing date for the motion be continued.
13

14 The parties also stipulate that the time between February 13, 2012 and March 19, 2012
15 should be excluded under the Speedy Trial Act because this continuance serves the ends of justice
16 due to the complex nature of this pretrial proceeding. *See* 18 U.S.C. § 3161 (h)(7)(B)(ii).
17

18 Respectfully submitted,

19 NOLAN, ARMSTRONG & BARTON, LLP

20 /s/

21 Dated: February 28, 2012

22 Shira Kieval for Thomas J. Nolan, Esq.
23 Attorney for Defendant
Sharon Wang

24 /s/

25 Dated: February 28, 2012

26 David Callaway
27 Assistant United States Attorney
28

ATTESTATION PER GENERAL ORDER 45

I, Shira Kieval, have permission from ECF User Thomas J. Nolan to use the ID and password being used to file this Stipulation. In compliance with General Order 45, X.B., I hereby attest that David Callaway has concurred with this filing.

~~PROPOSED~~ ORDER

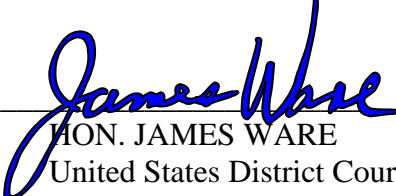
Based upon the stipulation of the parties, and good cause appearing therefor,

IT IS HEREBY ORDERED that the the filings deadlines and March 12, 2012 hearing on defendant Sharon Wang's motion to dismiss are CONTINUED. The following dates now govern defendant Wang's motion to dismiss:

Motion to dismiss filing deadline :	March 19, 2012
Opposition brief filing deadline :	April 2, 2012
Reply brief filing deadline :	April 9, 2012
Hearing on motion to dismiss :	23, April 16, 2012 at 1:30 p.m.

The time between February 13, 2012 and March 19, 2012 are hereby excluded under the Speedy Trial Act because this continuance serves the ends of justice due to the complex nature of this pretrial proceeding. *See* 18 U.S.C. § 3161 (h)(7)(B)(ii).

Dated: February 14, 2012


 HON. JAMES WARE
 United States District Court Judge